

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 05-00117-01 HG
)	
Plaintiff,)	DECLARATION OF COUNSEL
)	
vs.)	
)	
KENNETH CHIO HENG IONG, (01))	
)	
Defendant.)	
)	

DECLARATION OF COUNSEL

I, David F. Klein, declare as follows:

1. I am the attorney for Defendant KENNETH CHIO HENG IONG in the above-captioned case.
2. I was appointed to represent the Defendant in this matter.
3. The indictment charges eleven counts including bank fraud and tax evasion allegations.
4. There is voluminous discovery that is still needed to review.
5. I have been shown approximately 30 banker boxes of documents that are in the possession of the government.
6. The government has also provided me in excess of two thousand pages of discovery and several cds.

7. I am also the attorney for Defendant Naeem J. Williams in a matter in the United States District Court for the District of Hawaii in USA v. Williams, Cr. 06-00079-DAE ("Williams' case").

8. The Williams' case is a potential death penalty case.

9. On May 24, 2006, the United States Attorney's Office scheduled a conference for Williams' attorneys to meet with the Department of Justice's Death Penalty Review Committee. The meeting will be in Washington, D.C. on July 10, 2006.

10. In order to adequately prepare for this meeting, it has been necessary for me to work on the expected presentation before the Death Penalty Review Committee.

11. That I need additional time to adequately prepare this matter.

12. As a result, it is requested that the current trial week of August 15, 2006 is continued and the pretrial motion deadline is extended.

I DECLARE UNDER PENALTY OF PERJURY THAT THE
FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE
AND BELIEF.

DATED: Honolulu, Hawaii, July 5, 2006.

/s/ David F. Klein
DAVID F. KLEIN
Attorney for Defendant
KENNETH CHIO HENG IONG